

Claudia Center, State Bar No. 158255
ccenter@las-elc.org
Jinny Kim, State Bar No. 208953
jkim@las-elc.org
Elizabeth Kristen, State Bar No. 218227
ekristen@las-elc.org
THE LEGAL AID SOCIETY-EMPLOYMENT LAW CENTER
600 Harrison St., Suite 120
San Francisco, CA 94107
Telephone: (415) 864-8848
Facsimile: (415) 864-8199

Attorneys for Plaintiff Matthew Kina

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

MATTHEW KINA,)	No. C08 04358 PJH
)	
Plaintiff,)	
v.)	JOINT STIPULATION AND
)	[PROPOSED] ORDER CONTINUING
UNITED AIR LINES, INC.)	DEADLINE FOR PRIVATE MEDIATION
)	
Defendant.)	
)	
)	
)	
)	
)	
)	
)	

1. Whereas, pursuant to the Court's March 27, 2009 Order, the parties are to have completed private mediation by June 30, 2009;

2. Whereas, the parties have entered into a stipulated protective order and reached agreement regarding production of Plaintiff's medical records;

3. Whereas, the parties need additional time to receive and review Plaintiff's medical records, as well as complete depositions of Plaintiff and Defendant's witnesses prior to mediation;

4. Whereas, lead counsel for United will be in trial from May 18, 2009 until early June 2009;

5. Whereas, the trial date in this matter is set for May 10, 2010 and the discovery cutoff is not until November 25, 2009.

6. Therefore, the parties request that the date to complete private mediation be extended until August 30, 2009.

IT IS SO STIPULATED.

Dated: May 29, 2009

THE LEGAL AID SOCIETY --
EMPLOYMENT LAW CENTER

By: /s/ Jinny Kim
Claudia Center
Jinny Kim
Elizabeth Kristen

Attorneys for Plaintiff
Matthew Kina

LITTLER MENDELSON, P.C.

By: /s/ Mary D. Walsh
Nancy E. Pritikin
Kurt R. Bockes
Mary D. Walsh

Attorneys for Defendant
United Air Lines, Inc.

1 Pursuant to General Order No. 45 X. (B), I attest that concurrence in the filing of this
2 document has been obtained from Defendant's counsel.

3
4 Dated: May 29, 2009

Claudia Center
Jinny Kim
Elizabeth Kristen
THE LEGAL AID SOCIETY
EMPLOYMENT LAW CENTER

7
8 By: /s/ Jinny Kim
9 Jinny Kim

10 Attorney for Plaintiff
11 Matthew Kina
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29

ORDER

Good cause appearing, IT IS SO ORDERED.

The deadline to complete private mediation, currently scheduled for June 30, 2009, shall be continued to August 30, 2009.

Dated: 6/2/09



PROOF of SERVICE

I, Djuna Gray, declare:

I am a citizen of the United States, over 18 years of age, employed in the County of San Francisco, and not a party to or interested in the within entitled action. I am an employee of The LEGAL AID SOCIETY OF SAN FRANCISCO-EMPLOYMENT LAW CENTER, and my business address is 600 Harrison Street, Suite 120, San Francisco, California 94107.

On May 29, 2009 I served the following on all parties in said action:

**JOINT STIPULATION AND PROPOSED ORDER CONTINUING DEADLINE
FOR PRIVATE MEDIATION**

X by transmitting via the Court's CM/ECF electronic transmission system to the following parties listed below:

Attorneys of Plaintiffs

Claudia Center
Elizabeth Kristen
Jinny Kim
THE LEGAL AID SOCIETY-EMPLOYMENT LAW CENTER
600 Harrison Street, Suite 120
San Francisco, CA 94107

Attorneys for Defendants

Nancy Pritikin
Kurt Bockes
Mary Walsh
LITTLER MENDELSON
650 California Street, 20th Floor
San Francisco, CA 94108-2693

I declare under penalty of perjury under the laws of the State of California and of the United States of America that the foregoing is true and correct. Executed on May 29, 2009 at San Francisco, California.


Djuna Gray